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January 15, 2015

(Via ECF)

Hon. Katherine B. Forrest, U.S. District Judge
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: ***Helix Systems, Inc. et al. v. Akiva Berman et al.*, Index No. 15-cv-9763**

Dear Judge Forrest:

We represent plaintiffs Helix Systems, Inc. and Daniel Kalai (“Plaintiffs”) in the above-referenced matter. The parties are in the process of negotiating a settlement agreement of the claims asserted in this action and wish to extend the deadlines for expedited discovery and the pending motion to dismiss.

Upon conferring with counsel for defendants Akiva Berman and WDIIT, Incorporated (“Defendants”), the parties request that each of the deadlines for expedited discovery and the briefing schedule for Defendants’ pending motion to dismiss, ordered by this Court on December 28, 2015, be extended by seven (7) days.

Respectfully Submitted,

/s/ David J. Fryman

David J. Fryman